

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA *et al.*
ex rel. MARY BIXLER WOOD,

Plaintiff,

v.

SIEMENS MEDICAL SOLUTIONS
USA, INC., SIEMENS
HEALTHCARE DIAGNOSTICS INC.,
and SIEMENS HEALTHCARE
DIAGNOSTICS PRODUCTS GMBH,

Defendants.

No. 21-cv-1947 (MKB) (JRC)

Hon. Margo K. Brodie, U.S.D.J.

**SIEMENS' NOTICE OF MOTION
TO DISMISS THE AMENDED
COMPLAINT WITH PREJUDICE**

Please take notice that upon the accompanying Memorandum of Law and the Declaration of Joshua A. Goldberg and attached supporting materials, Siemens Medical Solutions USA, Inc. and Siemens Healthcare Diagnostics Inc. (collectively, "Siemens") move this Court, at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza E, Brooklyn, NY 11201 for an order dismissing Plaintiff-Relator's Amended Complaint with prejudice under Federal Rules of Civil Procedure 9(b) and 12(b)(6).

Dated: June 17, 2022
New York, New York

Respectfully submitted,

/s/ Joshua A. Goldberg
Joshua A. Goldberg
Lauren S. Potter
Jonathan H. Hatch

PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036-6710
Tel: (212) 336-2000
Fax: (212) 336-2222
jgoldberg@pbwt.com
lspotter@pbwt.com
jhatch@pbwt.com

*Attorneys for Siemens Medical Solutions USA, Inc.
and Siemens Healthcare Diagnostics Inc.*

To:

Daniel J. Kaiser
William H. Kaiser
Kaiser Saurborn & Mair, P.C.
30 Broad Street, 37th Floor
New York, NY 10004

Geoffrey R. Kaiser
Kaiser Law Firm, PLLC
926 RXR Plaza
Uniondale, NY 11556-0926

Attorneys for Plaintiff-Relator Mary Bixler Wood